



July 31, 2006

U. S. Department of Transportation  
Docket Management System  
400 7<sup>th</sup> Street, SW, Room PL-400  
Washington, DC 20591-0001

**Subject:** Request for an Exemption from the Provisions of 14 CFR 135.143(C)(2) Mode S Transponder

Island Airlines, Inc. is an Air Carrier operating as an Intrastate Common Carriage Operator, within the State of Massachusetts and under the rules of Part 135. Island Airlines operates small non-turbine powered aircraft defined under FAR Part 119 in both passenger and cargo operations. Island Airlines has served one city pair (Hyannis and Nantucket, MA) primarily since 1991. Nantucket, MA, with approximately 12,000 year-round residents, is an Island that depends on Air Service from “main land” destinations to support its economic and humanitarian needs. Island Airlines provides approximately 90% of the Air Cargo and 40% of the Passenger services for Nantucket Island. Although the Hyannis to Nantucket air route is not currently eligible for Essential Air Service subsidies, it is a market which clearly through history has proven that safe and dependable Air Service is an essential to its needs.

Island airlines is seeking relief from the provisions of 14 CFR 135.143(C)(2) whereby it may continue to operate under FAR Part 135 without a TSO-C112 (Mode S) Transponder installed in its fleet of 8 aircraft. Island Airlines presently operates with Mode A and Mode C capability. Island Airlines wishes to continue with its presently installed up-to-date Mode A/Mode C transponder equipment, until such time the equipment breaks and can no longer be repaired, in addition to like spares are depleted.

Supporting reasons for this request includes: Island Airlines operates within a region of the country (Northeast) that is well covered with ground based radar facilities providing safe traffic separation utilizing Mode A and Mode C equipment. Cape TRACON, the controlling FAA radar facility for the Hyannis and Nantucket region does NOT possess the ground sensors necessary to provide Mode S services and does not anticipate the installation of the ground sensors in the foreseeable near future. Island Airlines believes it is economically unfeasible and operationally burdensome at this time to convert its fleet of aircraft to Mode S equipment. With the grant of this requested exemption, Island Airlines believes that public safety is not adversely affected and it is in the public’s interest for Island Airlines to continue operating uninterrupted.

Should you have any further questions or comments, please do not hesitate to contact me at (508) 771-7774 extension 35.

Respectfully submitted,

W. Scott LaForge  
President/Director of Operations

WSL/dd